

CLERK'S OFFICE U.S. DIST. COURT
AT CHARLOTTESVILLE, VA
FILED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

APR 30 2020

JULIA C. DUDLEY, CLERK
BY: 
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UNITED STATES OF AMERICA) Criminal Number: 3:19-CR-00014
)
)
 v.) In Violation of:
)
)
DANIEL MCMAHON) 18 U.S.C. § 245(b)(4)
)
 Bias-Motivated Interference with
)
 Candidate for Elective Office
)
)
 18 U.S.C. § 2261A(2)
)
 Cyberstalking
)

**SUPERSEDING
INFORMATION**

The United States Attorney charges at all times material to this Information:

COUNT ONE

(Bias-Motivated Interference with Candidate for Elective Office)
18 U.S.C. § 245(b)(4)

1. From on or about January 7, 2019 to on or about January 10, 2019, within the Western District of Virginia and elsewhere, Defendant DANIEL MCMAHON, by threat of force willfully intimidated and interfered with, and attempted to intimidate and interfere with, D.G., because he was and had been, and in order to intimidate D.G. from, participating, without discrimination on account of race and color, in a federally protected activity described in 18 U.S.C. § 245(b)(1)(A), to wit, qualifying and campaigning as a candidate for Charlottesville City Council, an elective office in Charlottesville, Virginia.

2. All in violation of Title 18, United States Code, Section 245(b)(4).

COUNT TWO
(Cyberstalking)
18 U.S.C. § 2261A(2)

3. Beginning no later than on or about September 4, 2019, and continuing through on or about September 16, 2019, within the Middle District of Florida and elsewhere, Defendant DANIEL MCMAHON, with intent to injure and intimidate Victim 2, used any interactive computer service, electronic communication service, electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce, to engage in a course of conduct that placed Victim 2 in reasonable fear of serious bodily injury to Victim 2's immediate family member, and that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim 2 and her immediate family member.

4. All in violation of Title 18, United States Code, Section 2261A(2).

THOMAS T. CULLEN
UNITED STATES ATTORNEY

/s/Christopher R. Kavanaugh
CHRISTOPHER R. KAVANAUGH
ASSISTANT UNITED STATES ATTORNEY
WESTERN DISTRICT OF VIRGINIA